

FILED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Western District of TexasJUL 19 2019
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERKUnited States of America
v.
GABRIEL RAMIREZ (1)
DAVID RAMIREZ (2)

Case No. 5:19-MJ-831

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 18, 2019 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

21/841(a)(1) & 841(b)(1)(A)

Possession with Intent to Distribute more than 5 kilograms of a mixture
or substance containing a detectable amount of Cocaine.**PENALTY:**10 years - Life imprisonment; 5 years to Life Supervised Release;
\$10,000 fine; \$100 special assessment; and Forfeiture

+

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Complainant's signature

BRIAN WHITE, SAPD, DETECTIVE

Printed name and title

- ☒
- Sworn to before me and signed in my presence.
-
- ☐
- Sworn to telephonically and signed electronically.

Date:

7/19/19

City and state: SAN ANTONIO, TEXAS



Judge's signature

HENRY J. BEMPORAD, US MAGISTRATE JUDGE

Printed name and title

Attachment A

Your Affiant, Brian White, has been a Texas Peace Officer since 1994 and have been employed by San Antonio Police Department since that time. I am currently a detective assigned to the High Intensity Drug Trafficking Area (HIDTA) where I investigate mid-level to high-level drug trafficking activities which involve large quantities of narcotics and firearms.

On July 18, 2019, your Affiant, along with other law enforcement officers, executed a state narcotics search warrant at 4302 Howard, San Antonio, Texas, which is in the Western District of Texas. The warrant identified brothers **Gabriel Ramirez** and **David Ramirez** who reside at the residence and which have been observed by your Affiant on many occasions to engage in narcotic transactions.

Following the reading of the search warrant to all involved, **G. Ramirez**, having been given his statutory and constitutional warnings, identified for your Affiant, approximately

496 grams of cocaine in a dresser drawer in his bedroom and stated he had no US Currency; however, following the search of **G. Ramirez's** room, approximately \$29,900.00 in U.S. Currency was located in **G. Ramirez's** closet concealed in a hole in the wall.

D. Ramirez was detained coming out of his bedroom, where law enforcement located and seized approximately 66 grams of cocaine in a dresser drawer contained in a tan Gucci bag. Located on the floor of **D. Ramirez's** bedroom was large plastic tub which contained a white powdery substance which field tested positive for cocaine, mixed with an unknown brown substance, with an approximate total weight of 7,745 grams.

Also located in the residence was proof of residence for **G. Ramirez** and **D. Ramirez**, as well as two (2) 1 kilogram plastic containers of Lidocaine crystalline, a substance utilized to increase the volume of cocaine, one of which was empty. Also located in the hallway was a metal can containing acetone, a substance also utilized by drug traffickers. Also seized from the residence were approximately twenty (20) pair of high price boots and approximately twenty (20) pair of high price athletic shoes.

There is probable cause to believe, and your Affiant does believe, that on July 18, 2019, in the Western District of Texas, Gabriel Ramirez and David Ramirez, possessed with intent to distribute more than 5 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections

841(a) and 841(b)(1)(A).

A handwritten signature in black ink, appearing to read 'B. White', written over a horizontal line.

Brian White
SAPD HIDTA Detective

Sworn to before me and subscribed in my presence on July 19, 2019, at San Antonio, Texas.

A handwritten signature in blue ink, appearing to read 'H. Bemporad', written over a horizontal line.

HENRY J. BEMPORAD
UNITED STATES MAGISTRATE JUDGE